

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,
PATENT LITIGATION

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Case No. 2:22-MD-03042-JRG

JURY TRIAL DEMANDED

THIS DOCUMENT RELATES TO ALL
ACTIONS

**JOINT MOTION FOR ENTRY OF
SECOND AMENDED DOCKET CONTROL ORDER**

Pursuant to the Court’s First Amended Docket Control Order dated October 24, 2022 (Dkt. 15), the Parties comprising Taasera Licensing LLC (“Taasera”), Quest Patent Research Corporation (“Quest”), Check Point Software Technologies, Ltd. (“Check Point”), Trend Micro Incorporated (“Trend Micro Japan”), and Trend Micro, Inc. (“Trend Micro US”) have met and conferred and hereby file this Joint Motion for Entry of Agreed Second Amended Docket Control Order, attached hereto as Exhibit A. Counsel for Palo Alto Networks Inc. (“Palo Alto”) could not be reached. The new deadlines proposed by the Parties are summarized in the below chart.

| Current Deadline | New Deadline | Description |
|------------------|-------------------|---|
| November 4, 2022 | November 11, 2023 | *File Proposed Discovery Order The Proposed Discovery Order shall be filed as separate motions with the caption indicating whether or not the proposed order is opposed in any part. |

Good cause exists for amending the deadline to file the Proposed Discovery Order. There are three additional tag-along actions that were recently filed in this District and in the Western District of Texas:

- *Taasera Licensing LLC v. Fortinet Inc.*, C.A. No. 2:22-cv-00415 (E.D. Tex. Oct. 21, 2022)
- *Taasera Licensing LLC v. Musarubra US LLC, D/B/A Trellix*, C.A. No. 2:22-cv-00427-JRG (E.D. Tex. Oct. 31, 2022)
- *Taasera Licensing LLC v. CrowdStrike, Inc. and CrowdStrike Holdings, Inc.*, C.A. No. 6:22-cv-01094 (E.D. Tex. Oct. 21, 2022)

The additional time for these deadlines will facilitate negotiations on the Proposed Discovery Order between all parties to this multidistrict litigation (“MDL”) inclusive of the tag-along cases. The Parties will be prepared to discuss this deadline as well as other scheduling matters on the telephonic status conference on Tuesday, November 8, 2022.

Dated: November 4, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 4, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Alfred R. Fabricant

Alfred R. Fabricant

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel of record for Taasera, Quest, Check Point, Trend Micro Japan, and Trend Micro US have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed. Counsel for Palo Alto Networks Inc. ("Palo Alto") was unable to be reached for conference.

/s/ Alfred R. Fabricant

Alfred R. Fabricant